

IN THE CIRCUIT COURT FOR WASHINGTON COUNTY, MARYLAND

SHEILA ROWLEY  
c/o Greivell & Garrott Johnson, LLC  
5 Cornell Avenue  
Hagerstown, MD 21742

Plaintiff

v.

WALMART INC.  
701 South Walton Blvd.  
Bentonville, AR 72716

Serve on: The Corporation Trust Inc.  
2405 York Road, Suite 201  
Lutherville Timonium, MD 21093

Defendant

CASE NO.

C-21-CV-20-000282

\*\*\*\*\*

COMPLAINT

COMES NOW Plaintiff, Sheila Rowley, and sues Defendant, Walmart Inc., and for reasons states:

**Parties, Jurisdiction, Venue**

1. Plaintiff, Sheila Rowley, is an adult resident of Washington County, Maryland.
2. Defendant, Walmart Inc., is a corporation formed in Delaware with its principal place of business in Arkansas, and which operates stores around the United States, including at least one in Washington County, Maryland.
3. This is a tort action for an incident that occurred at a Walmart location in Washington County, namely, Walmart Store # 1674, located at 17850 Garland Groh Boulevard, Hagerstown, Maryland 21740, on or about June 12, 2017.
4. Jurisdiction and venue are appropriate in Washington County, Maryland.

### COUNT I - NEGLIGENCE

5. Plaintiff incorporates and re-alleges the allegations of all preceding paragraphs as if fully set forth herein.
6. On or about June 12, 2017, Plaintiff was in the front vestibule area of the Walmart store on Garland Groh Blvd. in Hagerstown, Maryland attempting to grab a shopping cart as she entered the store for her shopping trip when a Walmart employee pushed a string of shopping carts driven by a motorized cart-transporter into and over Plaintiff's leg, causing injury.
7. The employee pushing the carts and operating the motorized cart-transporter was outside the store at the time of the accident, and was pushing the carts from the outside to the inside vestibule cart-storage area.
8. From the outside the employee either did not observe, was unable to observe, or failed to exercise due care to attempt observe that the pathway was clear for the carts to be returned into the vestibule area when he caused the carts to crash into the Plaintiff.
9. Walmart owed a duty to its patron and customer, the Plaintiff, to use reasonable care in returning the carts to the vestibule area so that no customers would be struck by the carts.
10. By failing to exercise reasonable care in returning the carts, Walmart negligently breached the duties owed to its patron, the Plaintiff, resulting in serious injury to her leg and knee.
11. As a direct and proximate result of Walmart's negligence in causing injury to the Plaintiff, she suffered serious, painful temporary and permanent bodily injuries, great physical pain and mental anguish, severe and substantial emotional

**GREIVELL  
&  
GARROTT  
JOHNSON  
LLC**

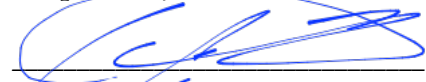
5 Cornell Avenue  
Hagerstown, MD 21742  
t: (240) 310-9150  
f: (877) 262-4810  
[www.GreivellLawOffice.com](http://www.GreivellLawOffice.com)

distress, loss of the capacity for the enjoyment of life; was, is and will be required to undergo medical treatment and to incur medical costs and expenses in order to alleviate the injuries, pain and suffering; was, is and will be precluded from engaging in normal activities and pursuits, including a loss of ability to earn money and of actual earnings; and otherwise was hurt, injured and caused to sustain loss. Specifically, without limiting the foregoing in any way, Plaintiff suffered injuries to her leg and knee, and, as of the date of this Complaint has not fully recovered.

12. All of Plaintiff's losses were, are and will be due solely to and by reason of the carelessness and negligence of Walmart without any negligence or want of due care on the Plaintiff's part contributing thereto.

WHEREFORE, Plaintiff, Sheila Rowley, demands judgment against Defendant, Walmart Inc., in an amount exceeding \$75,000.00, plus interest, costs, reasonable attorneys' fees, and such other and further relief as the nature of this cause may require.

Respectfully submitted,



Adam D. Greivell, Esquire  
CPF ID# 0512130328  
Greivell & Garrott Johnson, LLC  
5 Cornell Avenue  
Hagerstown, Maryland 21742  
(240) 310-9150  
adam@greivelllawoffice.com  
Attorneys for Plaintiff, Sheila Rowley

**CERTIFICATE REGARDING RESTRICTED INFORMATION**

I HEREBY CERTIFY that this document does not contain any restricted information.

/s/ Adam D. Greivell  
Adam D. Greivell, Esquire

**GREIVELL  
&  
GARROTT  
JOHNSON  
LLC**

5 Cornell Avenue  
Hagerstown, MD 21742  
t: (240) 310-9150  
f: (877) 262-4810  
www.GreivellLawOffice.com